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August 8, 2005

HAND DELIVERY

Honorable Pat Miller, Hearing Officer c/o Sharla Dillon, Docket & Records Manager Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE: BellSouth Telecommunications, Inc. Tariff Filing To Introduce

Transit Traffic Service, Tariff No. 04-01259

Docket No. 04-00380

Dear Hearing Officer Mıller:

Enclosed please find one (1) original and thirteen (13) copies of the *Petition For Leave to Intervene of Verizon Wireless* for filing in the above-referenced matter A check for the \$25.00 filing fee is enclosed.

Also enclosed is an additional copy of the document to be "File Stamped" for our records. The enclosed document has been served on all parties of record.

If you have any questions or need additional information, please let me know.

Very truly yours,

Melvin / Malone

MJM:cgb

Enclosures

cc: Elaine Critides
William Ramsey
Guy Hicks
R. Douglas Lackey
Edward Phillips
Guilford Thornton

Henry Walker

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:)	
BELLSOUTH TELECOMMUNICATIONS,)	DOCKET NO. 04-00380
INC. TARIFF FILING TO INTRODUCE)	
TRANSIT TRAFFIC SERVICE,)	
TARIFF NO. 04-01259		

PETITION FOR LEAVE TO INTERVENE OF VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless, on behalf of itself and its affiliates, ("Verizon Wireless" or "Petitioner"), by and through its undersigned counsel, hereby seeks leave to intervene in the above-captioned proceeding pursuant to Tenn. Code Ann. § 4-5-310. In support of this petition, Petitioner states as follows:

- 1. Petitioner is a Commercial Mobile Radio Service ("CMRS") provider licensed by the Federal Communications Commission ("FCC") to provide services in the State of Tennessee. Petitioner provides telecommunications services throughout Tennessee.
- 2. Petitioner, through its business conduct in the State of Tennessee, owns and operates certain wireless communications services and facilities throughout Tennessee.
- 3. On August 3, 2005, the Tennessee Regulatory Authority ("Authority" or "TRA") issued the *Order Establishing Issues List and Procedural Schedule* ("Order") in this docket.
- 4. Upon carefully reviewing the Final Issues List attached to the Order, Petitioner has determined that the subject matter of this proceeding may directly affect Petitioner's operations in the State of Tennessee.

- 5. Therefore, Petitioner's legal rights, duties, privileges, immunities or other legal interests may be determined in this proceeding.
- 6. Because of its direct interest in this proceeding, Petitioner respectfully seeks to intervene in this matter.
- 7. The interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the requested intervention.
- 8. Should the requested intervention be granted, all notices, pleadings, orders, documents and the like in this proceeding should be provided to:

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J. Barclay Phillips
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Based on the foregoing considerations, Petitioner urges the Authority to grant this request for intervention.

Respectfully submitted,

Melvin J. Malone J. Barclay Phillips

MILLER & MARTIN PLLC 150 Fourth Avenue North 1200 First Union Tower Nashville, TN 37219-2433 (615) 244-9270

Attorneys for Verizon Wireless

Elaine Critides Counsel for Verizon Wireless

CERTIFICATE OF SERVICE

I hereby certify that on Avgust 8, 2005, a true and correct copy of the foregoing has been served on the parties of record, via the method indicated:

[] Hand [] Mail [] Facsimile [] Overnight [] Electronically	William T. Ramsey, Esq. Neal & Harwell, PLC 2000 One Nashville Place 150 Fourth Avenue North Nashville, TN 37219 ramseywt@nealharwell.com
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